

# EXHIBIT A

JEFF FINE  
Clerk of the Superior Court  
By: Fawn Fowler, Deputy.

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----- CASE# CV2022-003548 -----	
CIVIL NEW COMPLAINT	333.00

TOTAL AMOUNT 333.00

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## SUPERIOR COURT OF THE STATE OF ARIZONA

### FOR THE COUNTY OF MARICOPA

L.M.W., individually, and as the biological  
father and on behalf of L.W., a minor,

Plaintiff,

vs.

THE STATE OF ARIZONA; JONAS PERRY  
and Jane Doe Perry, Husband and Wife;  
ANITA MCDONALD and JOHN DOE  
MCDONALD, Wife and Husband; ANNA  
APOLINAR and JOHN DOE APOLINAR,  
Wife and Husband; CHRISTINA GARY and  
JOHN DOE GARY, Wife and Husband;  
BRITTANY SCOTT-MEMBRILA and JOHN  
DOE MEMBRILA, Wife and Husband;  
SONYA TYUS and JAMES TYUS, Wife and  
Husband; A NEW LEAF, INC., and Arizona  
nonprofit corporation,

Defendant.

CV 2022-003548

Case No. \_\_\_\_\_

### COMPLAINT

- Gross Negligence
- Willful and Wanton  
Conduct/Negligence
- Loss of Consortium
- Civil Rights Violations, 42 U.S.C.  
§ 1983

### TIER 3

### Introduction

1. This is a case about the government's removal of a child from his father's home through the use of material misrepresentations, mischaracterizations, inaccuracies, and false statements, and its subsequent failure to protect the child from sexual abuse after

1 placing the child into a foster home. Plaintiff has filed this claim to hold the defendants  
2 accountable for their gross malfeasance.

3 **Parties, Jurisdiction, and Venue**

4 2. Plaintiff [REDACTED] ([REDACTED] or "Plaintiff") and his minor son, [REDACTED], were,  
5 at all times relevant, residents of Maricopa County.

6 3. Defendant State of Arizona (the "State") was, at all relevant times, acting  
7 through the Arizona Department of Child Safety ("DCS") and the DCS employees joined  
8 to this action.

9 4. Defendants Jonas Perry ("Perry") and Jane Doe Perry are a married couple  
10 residing in Maricopa County. Perry was, at all relevant times, a DCS investigator.

11 5. Defendants Anita McDonald ("McDonald") and John Doe McDonald are a  
12 married couple residing in Maricopa County. McDonald was, at all relevant times, a DCS  
13 supervisor.

14 6. Defendants Anna Apolinar ("Apolinar") and John Doe Apolinar are a  
15 married couple residing in Maricopa County. Apolinar was, at all relevant times, a DCS  
16 caseworker.

17 7. Defendants Christina Gary ("Gary") and John Doe Gary are a married  
18 couple residing in Maricopa County. Gary was, at all relevant times, a DCS caseworker.

19 8. Defendants Brittany Scott-Membrila ("Scott-Membrila") and John Doe  
20 Scott-Membrila are a married couple residing in Maricopa County. Scott-Membrila was,  
21 at all relevant times, a DCS caseworker.

22 9. Perry, McDonald, Apolinar, Gary, and Scott-Membrila are collectively  
23 referred to as the "DCS Defendants."

24 10. At all relevant times, the DCS Defendants were actively involved in, and  
25 aware of, the matters set forth below, and mutually aided and abetted each other.

26 11. At all relevant times, the DCS Defendants were acting in the course and  
27 scope of their employment/agency with DCS.

28

12. Defendant A New Leaf, Inc. FKA Prehab or Arizona Inc. is an Arizona non-profit corporation.

13. Defendants Sonya Tyus ("Tyus") and James Tyus are a married couple residing in Maricopa County. Tyus was, at all relevant times, an employee and/or agent of A New Leaf.

14. The individual defendants were, at all relevant times, acting in furtherance of, and for the benefit of, their marital community and their spouses are joined under A.R.S. § 25-215.

**15. Venue is proper in this Court under A.R.S. § 12-401.**

**16. This case qualifies for Tier 3 designation under Ariz. R. Civ. P. 26.2.**

17. Plaintiff served a Notice of Claim dated September 14, 2021 at to all defendants in accordance to A.R.S. § 12-821.01. On information and belief, Scott-Membrila deliberately evaded service of the Notice of Claim, resulting in a delay in service until November 7, 2021.

18. This Court has jurisdiction over this action under A.R.S. § 12-123 and the Arizona Constitution, Article VI, § 14.

## GENERAL ALLEGATIONS

19. [REDACTED] is the minor biological child of [REDACTED] and non-party [REDACTED] ("[REDACTED]").

20. [REDACTED] and [REDACTED] shared parenting time and legal decision making over [REDACTED] pursuant to a court order.

21. [REDACTED] disagreed with many of the parenting choices that [REDACTED] made. Not wanting to break a court order, however, [REDACTED] simply resolved to make the best of the parenting arrangement and allowed [REDACTED] to have her parenting time despite his personal misgivings.

22. On November 30, 2020, DCS Perry applied for and obtained an order authorizing DCS to take [REDACTED] into temporary physical custody. Perry verified the application under oath.

1       23. In the application, Perry represented that probable cause existed to believe  
2 that [REDACTED] was suffering from abuse or neglect and that it would be contrary for [REDACTED] to  
3 remain in [REDACTED] home because her "behavior is violent, erratic, unpredictable,  
4 incoherent, and totally inappropriate and is a threat to [REDACTED]'s safety."

5       24. As for [REDACTED], Perry claimed he was a suspected drug trafficker and was  
6 aware of [REDACTED] criminal activity but—despite the court order setting parenting time—  
7 failed to "take protective action over [the child]." These statements were false and without  
8 factual support. [REDACTED] is not a drug trafficker and, although [REDACTED] would occasionally  
9 smoke marijuana in his home, he was a medical marijuana card-holder and did not smoke  
10 marijuana in [REDACTED] presence and stored his marijuana on a high shelf so that [REDACTED] could  
11 not access it.

12       25. Perry found less intrusive options neither feasible nor sufficient to manage  
13 [REDACTED] safety, primarily because [REDACTED] had refused to cooperate with DCS. But in  
14 Perry's view, placing the child in [REDACTED] custody was not an option because his "only  
15 support is his mother," who Perry claimed had help [REDACTED] "break the terms of his past  
16 probation." This statement was false and without factual support. [REDACTED] mother,  
17 [REDACTED], has no criminal history nor has she assisted [REDACTED] in violating any  
18 probationary terms.

19       26. Perry further claimed that [REDACTED] "would show up to school high off of  
20 marijuana from" [REDACTED]. These statements were false and without factual support.  
21 Presumably referring to [REDACTED], Perry concluded that [REDACTED] "does not recognize safety  
22 threats for [REDACTED] but leaves him in situations that endanger him."

23       27. On December 9, 2020, DCS filed a dependency petition alleging that,  
24 despite its diligent efforts, it had been unable to locate [REDACTED] to take the child into  
25 temporary custody.

26       28. The petition stated that [REDACTED] told DCS that [REDACTED] was with [REDACTED],  
27 however, none of the addresses she provided were [REDACTED] and "he has not returned . . .  
28 messages left on his phone."

1        29. The petition further claimed that DCS attempted to identify and place the  
2 child with a grandparent or other family member and would assess family placement  
3 options after removing [REDACTED] from the parents' custody. But these statements were false  
4 and without factual support.

5        30. Upon information and belief, DCS did not follow its own internal processes  
6 and procedures to find the child, including without limitation failing to verify [REDACTED]  
7 address with the Department of Education, the Maricopa County Assessor, and the  
8 Maricopa County Recorder.

9        31. A day later, the superior court issued an order for a pickup of a minor child.

10       32. [REDACTED] did not receive notice of either the petition or the pickup order.

11       33. On December 11, 2020, a meeting was held with Perry, other DCS  
12 employees, [REDACTED], and [REDACTED] paternal grandmother [REDACTED] ("[REDACTED]").

13       34. During the meeting, [REDACTED] offered to be [REDACTED] foster guardian. [REDACTED]  
14 did not object to this arrangement.

15       35. At Perry's request, [REDACTED] also provided him with what information she  
16 could recall about [REDACTED] new home address. Soon enough, however, the meeting  
17 devolved into a back and forth over whether [REDACTED] had ever accused [REDACTED] of being  
18 a drug trafficker, as Perry claimed.

19       36. On the evening of December 17, 2020, DCS removed [REDACTED] from [REDACTED]  
20 care and placed him in a foster home.

21       37. Four days later, DCS caused [REDACTED] to undergo a rapid response assessment  
22 with La Frontera Arizona. The assessment noted that the DCS referral indicated that,  
23 "when asked if [the child] has been touched by anyone that makes him feel  
24 uncomfortable[,] he replies yes but shuts down after making this statement." The  
25 assessment concluded that child neglect or abandonment was suspected, and referred the  
26 child to ongoing services. It is also believed that DCS took [REDACTED] to Phoenix Children's  
27 Hospital for medical testing without either parent's consent.  
28



1        38. DCS placed [REDACTED] in a foster home operated by A New Leaf shortly after  
2 removing [REDACTED] from [REDACTED] care.

3        39. At the time, Sonya Tyus supervised the foster home. Upon information and  
4 belief, Sonya Tyus has been previously convicted of crimes of moral turpitude. Tyus was  
5 found guilty of issuing dishonored checks in Oakdale, Minnesota with a court disposition  
6 date of November 2, 1995. Tyus was again convicted of issuing dishonored checks with a  
7 court disposition date of May 9, 2016 in Anoka County, Minnesota.

8        40. [REDACTED] was in the foster home from December 18, 2020 to January 27, 2021.  
9 Meanwhile, [REDACTED] continued to insist to DCS he would undergo drug testing or take  
10 parenting classes—whatever was necessary—if it meant DCS would return [REDACTED] to his  
11 care. [REDACTED] also asked, to no avail, about [REDACTED] reported hospitalization. At around the  
12 same time, [REDACTED] renewed her request to be [REDACTED] guardian to Perry who stated he  
13 would need to run a background check on her beforehand.

14        41. [REDACTED] later heard she had been denied placement and called Perry to find  
15 out more. Surprised that she had heard this news, Perry eventually explained to her that  
16 she would be receiving a letter from the Attorney General's office to explain the denial.  
17 No such letter ever came; instead, Perry sent [REDACTED] a letter dated January 4, 2021,  
18 explaining [REDACTED] could not be placed with her because she had failed to cooperate with  
19 DCS. Perry, however, had already committed to the false narrative that [REDACTED] helped  
20 [REDACTED] violate his parole and was thus an unsuitable placement for L.W.

21        42. Perry disseminated further false statements about [REDACTED] fitness to act as  
22 [REDACTED] guardian, including that she knew [REDACTED] had been exposed to illegal drugs—even  
23 presenting to school with marijuana in his hair—but did not have any problems with that  
24 behavior. Although [REDACTED] was denied placement, [REDACTED] was eventually placed with his  
25 paternal aunt and uncle, [REDACTED] and [REDACTED] after he left the home on January 27,  
26 2021.

27        43. While [REDACTED] was in foster care, [REDACTED] ability to interact with the child was  
28 limited to short visitations. On their January 4, 2021 visit, [REDACTED] noticed severe scratches

1 on [REDACTED] back. Despite bringing this to DCS's attention, DCS never contacted [REDACTED]  
2 with information about the investigation.

3 44. DCS caseworker Gary, herself a mandatory reporter, was made aware of the  
4 scratches and potential abuse, but likewise failed to make any investigation or take any  
5 corrective action.

6 45. Only later did DCS's child advocate, Sarah Bruce ("Bruce"), report that the  
7 DCS caseworker assigned to [REDACTED] case, Scott-Membrila, had deemed the scratches on  
8 [REDACTED] back not to be an ongoing issue.

9 46. On February 4, 2021, [REDACTED] informed Bruce that he had heard reports that  
10 [REDACTED] had made disclosures regarding molestation and abuse. Scott-Membrila then  
11 informed him that this had been noted in the rapid response assessment conducted on  
12 December 21, 2020 but that there was no evidence of abuse. In other words, Scott-  
13 Membrila assured [REDACTED] that there was nothing to worry about at this stage.

14 47. Scott-Membrila's assurances did not hold for long. On March 19, 2021,  
15 [REDACTED] ("[REDACTED]"), the paternal aunt with whom [REDACTED] was recently placed,  
16 contacted the DCS hotline to report that [REDACTED] had made disclosures of abuse concerning  
17 his time in foster care. Specifically, [REDACTED] reported experiencing sexual abuse at the hands  
18 of another juvenile at the home. The next day, [REDACTED] explained these disclosures to a  
19 DCS parental aide who then informed Scott-Membrila. [REDACTED] would later convey this  
20 information to [REDACTED].

21 48. Specifically, [REDACTED] reported experiencing sexual abuse at the hands of  
22 another juvenile ("Child 1") at the foster home. [REDACTED] reported that Child 1 at the house  
23 had [REDACTED].  
24 L.W. reported that this occurred on multiple occasions in multiple places in the house.

25 49. [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
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During

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a subsequent supervised parental visitation with [REDACTED] and [REDACTED], [REDACTED] explained

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these disclosures to a DCS parental aide with the hopes of her being able to provide her

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brother with some emotional support and skills to help him work through some very

14

difficult time. The parent aide subsequently informed Scott-Membrila. During the ensuing

15

day(s), [REDACTED] would later convey this information to [REDACTED]

16

52. Three months after [REDACTED] first disclosed abuse, Scott-Membrila then

17

contacted the Department of Public Safety to investigate the New Leaf home.

18

53. The investigation confirmed that at least one of [REDACTED] abusers had likewise

19

undergone sexual abuse.

20

54. DCS case worker Scott-Membrila was subsequently removed from [REDACTED]

21

case and DCS's case was dismissed.

22

55. [REDACTED] has been returned to [REDACTED] care and custody.

23

56. Since being returned to his father, [REDACTED] has asked [REDACTED] several times,

24

"Where were you when they were doing this to me and why didn't you come and get me,"

25

or words to that effect.

26

Count I – Gross Negligence

27

(by [REDACTED] on behalf of [REDACTED] against the State and the DCS Defendants)

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1        57. A negligence claim has four elements: (1) a duty requiring the defendant to  
2 conform to a certain standard of care; (2) a breach by the defendant of that standard; (3) a  
3 causal connection between the defendant's conduct and the resulting injury; and (4) actual  
4 damages.

5        58. Typically, a duty of care arises from special relationships based on conduct,  
6 contract, or family relations.

7        59. A grossly negligent breach of that duty occurs when the state or its  
8 employees act or fail to act despite knowing, or having reason to know, facts which would  
9 lead a reasonable person to realize that their conduct not only creates an unreasonable risk  
10 of bodily harm to others but also involves a high probability that substantial harm will  
11 result.

12        60. After removing [REDACTED] from [REDACTED] care and placing [REDACTED] in a foster home,  
13 the State and DCS Defendants affirmatively assumed responsibility for that [REDACTED] safety  
14 and general well-being.

15        61. The State and the DCS Defendants breached their duty relative to [REDACTED]  
16 because they knew or had reason to know that placing [REDACTED] in foster home and keeping  
17 him there, despite disclosures of abuse, created an unreasonable risk of bodily harm to  
18 [REDACTED] and there was a high probability that substantial harm would result.

19        62. The State and the DCS Defendants further breached that duty by failing to  
20 follow DCS's own procedures for locating and removing a child, not even evaluating  
21 whether paternal aunt and uncle would be a sufficient placement for [REDACTED] instead of a  
22 foster home.

23        63. Moreover, the State and the DCS Defendants breached that duty by  
24 collectively failing to act or timely investigate [REDACTED] disclosures or to take corrective  
25 action to protect [REDACTED] in any way.

26        64. As a result of the conduct of the State and the DCS Defendants, [REDACTED] has  
27 suffered physical, mental, and emotional trauma, some of which may be permanent in  
28 nature, and that will likely require future counseling and other treatment.

**Count II – Willful and Wanton Conduct/Negligence**

(by [REDACTED] on behalf of [REDACTED] against A New Leaf and Tyus)

65. A New Leaf and Tyus assumed an affirmative duty and assumed responsibility for [REDACTED] safety and general well-being by taking [REDACTED] into their custody.

66. A New Leaf and Tyus knew or should have known that [REDACTED] faced an unreasonable risk of sexual abuse and it was substantially likely that such abuse would occur.

67. Despite the risks, A New Leaf and Tyus failed to act despite knowing, or having reason to know, facts which would lead a reasonable person to realize that their conduct not only create an unreasonable risk of bodily harm to others but also involved a high probability that substantial harm will result.

68. As a result of the conduct of A New Leaf and Tyus, [REDACTED] has suffered physical, mental, and emotional trauma, some of which may be permanent in nature, and that will likely require future counseling and other treatment.

69. [REDACTED] is entitled to an award of punitive damages against A New Leaf and Tyus because they acted willfully, maliciously, and with an evil mind, or with reckless disregard to the substantial possibility that their actions would cause injury to others.

70. In the alternative, if the conduct of A New Leaf and Tyus does not rise to the level of willful and wanton conduct, this Count is pled in the alternative as negligence.

**Count III – Loss of Consortium**

(by [REDACTED] against the State, the DCS Defendants, A New Leaf, and Tyus)

71. As [REDACTED] biological father, [REDACTED] holds a derivative loss of consortium claim relative to Count I and Count II.

72. When all the underlying elements of the child's tort claims are present, the parent possesses a loss of consortium claim to compensate the parent for the loss of love, affection, protection, support, services, companionship, care, and society of the child.

73. In this case, [REDACTED] suffered a severe, permanent and/or disabling injury rendering that significantly damaged the child-parent relationship.

1        74. As a result of the conduct of Tyus and A New Leaf, [REDACTED] has suffered  
 2 mental and emotional trauma, some of which may be permanent in nature, and that will  
 3 likely require future counseling and other treatment.

4                    **Count IV – 42 U.S.C. 1983 Civil Rights Claim**

5        (by [REDACTED] individually and on behalf of [REDACTED] against the DCS Defendants)

6        75. 42 U.S.C. § 1983, provides a cause of action for the deprivation of any  
 7 rights, privileges, or immunities secured by the Constitution and laws by any person acting  
 8 under color of any statute, ordinance, regulation, custom, or usage, or any State or  
 9 Territory.

10        76. Parents and children have a well-established right to live together free from  
 11 governmental interference without due process of law.

12        77. The right has both a substantive and procedural component.

13        78. State officials may interfere with this right only when they provide parents  
 14 with fundamentally fair procedures. They cannot seize children and make them wards of  
 15 the state without first pursuing reasonable avenues of investigation.

16        79. Further, the intrusion into the parent-child relationship must be reasonably  
 17 necessary to avert a specific injury to the child. These are indispensable requirements  
 18 absent reasonable cause to believe the child is in imminent danger of a serious bodily  
 19 injury.

20        80. The due process clause of the United States Constitution also contains a  
 21 substantive component, sometimes referred to as “substantive due process,” which bars  
 22 certain arbitrary government actions regardless of the fairness of the procedures used to  
 23 implement them. Thus, substantive due process guards against affirmative abuse of  
 24 government power that shocks the conscience.

25        81. As set forth above, the conduct of the DCS Defendants violated the  
 26 substantive and procedural due process rights of both [REDACTED] and [REDACTED]  
 27  
 28

1           82. Even if not deliberate, state officials are liable—and not entitled to the shield  
2 of qualified immunity—for false statements submitted to court they know to be false or  
3 would have known were false but for their reckless disregard of the truth.

4           83. Nevertheless, Perry submitted false statements to the court during the  
5 proceedings discussed above, including without limitation that (1) [REDACTED] was a drug  
6 trafficker; (2) [REDACTED] mother [REDACTED] had helped [REDACTED] violate his parole; (3) [REDACTED]  
7 knew [REDACTED] had been exposed to illegal drugs—even presenting to school with marijuana  
8 in his hair—but did not have any problems with that behavior; and (4) [REDACTED] did not  
9 cooperate with DCS. Further, Arizona’s litigation privilege does not operate to bar federal  
10 civil rights claims.

11           84. Upon information and belief, Perry would later admit these statements were  
12 false.

13           85. These statements had significant consequences. [REDACTED] would never have  
14 presented to the foster home had qualified for placement.

15           86. Additionally, the conduct of the DCS Defendants was conscience-shocking.  
16 In addition to Perry’s misrepresentations in the dependency proceedings, the DCS  
17 Defendants did not explore whether [REDACTED] or [REDACTED] and her husband [REDACTED] could serve  
18 as a guardian for [REDACTED]. In their apparent zeal to separate [REDACTED] from his family no matter  
19 what, the DCS Defendants failed to conduct an adequate investigation and then made  
20 misrepresentations in court to achieve that end. Despite [REDACTED] frequently writing to the  
21 DCS Defendants to explain his willingness to take drug tests and whatever classes were  
22 necessary, the DCS Defendants also delayed in providing him with reunification services.  
23 And even though [REDACTED] continually raised concerns about the conditions in the New  
24 Leaf home—including the significant scratches on [REDACTED] back—the DCS Defendants did  
25 not even investigate what occurred there until several months after the fact. They failed to  
26 do so despite the child’s disclosures on December 21, 2020. That failure to act shocks the  
27 conscience such that it violates substantive due process.



1        87. The Fourteenth Amendment's substantive due process clause also protects  
2 the liberty interest of children in state custody in social worker supervision and protection  
3 from harm inflicted by a third party for the duration of that custody.

4        88. In that context, deliberate indifference requires a showing of an objectively  
5 substantial risk of harm and a showing that the officials were subjectively aware of facts  
6 from which an inference could be drawn' that such a risk existed and that either the official  
7 actually drew the inference or that a reasonable official would have been compelled to  
8 draw that inference.

9        89. The DCS Defendants violated their duty to protect [REDACTED] from harm for the  
10 duration of [REDACTED] time as a ward of the state. To reiterate, [REDACTED] made disclosures of abuse  
11 on December 21, 2020. None of the DCS Defendants conducted any reasonable follow up  
12 investigation on those disclosures. When [REDACTED] later raised the fact that there were  
13 extensive scratches running down [REDACTED] back, the DCS Defendants dismissed his  
14 fatherly concern for [REDACTED] physical safety because it was deemed not to be an ongoing  
15 issue.

16        90. As a result of the conduct of the DCS Defendants, [REDACTED] and [REDACTED] have  
17 suffered mental and emotional trauma, some of which may be permanent in nature, and  
18 that will likely require future counseling and other treatment.

19        91. [REDACTED] is entitled to an award of punitive damages against the DCS  
20 Defendants because they acted willfully, maliciously, and with an evil mind, or with  
21 reckless disregard to the substantial possibility that their actions would cause injury to  
22 others.

23        92. As to this Count, [REDACTED] and [REDACTED] seek an award of costs and attorneys'  
24 fees under 42 U.S.C. § 1988.

25        **Count V - 42 U.S.C. 1983 Civil Rights Claim Against Private Parties**

26        (by [REDACTED] individually and on behalf of [REDACTED] against Tyus and A New Leaf)  
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28



1           93.    42 U.S.C. liability extends to a private party where the private party engaged  
2 in state action under color of law and thereby deprived a plaintiff of some right, privilege,  
3 or immunity protected by the Constitution or the laws of the United States.

4           94.    The liability is not limited to individuals. In a *Monell* claim, a plaintiff may  
5 seek redress against a private entity that deprived the plaintiff of his or her constitutional  
6 rights if the entity's policy, practice, or custom was responsible for the asserted  
7 deprivation.

8           95.    *Monell* liability can be premised on a failure to train that amounts to  
9 deliberate indifference.

10          96.    Deliberate indifference requires a showing that the entity defendant  
11 disregarded a known or obvious consequence of its actions. A pattern of prior violations  
12 is not required to demonstrate deliberate indifference; rather, *Monell* liability is proper  
13 when the unconstitutional consequences of a failure to train are patently obvious and  
14 highly predictable.

15          97.    It is a tragic reality of the foster care system that many of the children have  
16 been abused and may face abuse at the hands of other children once inside that system.

17          98.    Given that, the need to adequately train individuals to take precautions to  
18 identify and prevent abuse, and to thoroughly investigate disclosures of abuse, is  
19 particularly pressing.

20          99.    Despite this environment, and in the face of reports of the abuse suffered by  
21 [REDACTED], A New Leaf and Sonya Tyus took no such acts at all. Under the circumstances, the  
22 consequences of the failure to train are so obvious that they are deliberately indifferent to  
23 the constitutional rights of [REDACTED] and [REDACTED]

24          100.   As a result of the conduct of A New Leaf and Tyus, [REDACTED] and [REDACTED] have  
25 suffered mental and emotional trauma, some of which may be permanent in nature, and  
26 that will likely require future counseling and other treatment.

### **PRAYER FOR RELIEF**

RESPECTFULLY SUBMITTED this 22<sup>ND</sup> day of March, 2022.

**William M. Fischbach  
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